

Briefing Statement

Bureau: National Park Service
Issue: Valley Forge Asbestos Release Site
Park Site: Valley Forge National Historical Park
Date: FY 2006

Background:

In January 1997, during the installation of a fiber optic cable in the Amphitheater Quarry of Valley Forge National Historical Park (VAFO), Park staff discovered a suspicious substance in the soil later confirmed to contain asbestos. At the request of the National Park Service (NPS), the U.S. Environmental Protection Agency (USEPA) initiated an emergency response action between May and October 1997 to abate the immediate risks to public health, welfare and the environment posed by the potential airborne release of asbestos from contaminated soils. The impacted area is referred to as the Valley Forge Asbestos Release Site (ARS or Site).

The Keene Corporation (Keene), along with its predecessors-in-interest, operated an asbestos manufacturing facility at a location that is now part of VAFO. From approximately 1925 until the early 1970's, Keene and its predecessors disposed of waste products resulting from its manufacturing operations in several inactive limestone quarries located both on property owned by Keene and, with authorization from the Commonwealth of Pennsylvania (Commonwealth), on adjacent property owned by the Commonwealth. It is this waste disposal practice that created the Site. The Site is approximately 112 acres, divided into two operable units (the Former State Lands OU and the Keene Plant OU), and further divided into 15 Areas of Concern (AOCs). While the primary contaminant at the site is asbestos, contaminants other than asbestos also have been detected, including arsenic, lead, polycyclic aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs), among others. NPS is the lead agency for Site remediation.

In December 1999, NPS and the Commonwealth, represented by the Pennsylvania Department of Conservation and Natural Resources (DCNR), reached an Agreement on Consent (Agreement) whereby the Commonwealth would conduct a Remedial Investigation and Feasibility Study (RI/FS) of the Site in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). On behalf of the Commonwealth, implementation of the Agreement has been assigned to the Pennsylvania Department of Environmental Protection (PADEP). In deference to the Commonwealth's status as a sister sovereign, the Agreement did not include enforceable deadlines by which the Commonwealth would complete work. Consequently, this process has, at times, languished. In 2002, a settlement was reached with the legal successor to Keene, leaving the Commonwealth as the only remaining potentially responsible party at this Site.

Current Status:

The Commonwealth prepared a Draft Feasibility Study (FS) in May 2005. NPS staff and contractors reviewed the Draft FS and provided comments to the Commonwealth on June 8, 2005. Once NPS and the Commonwealth resolve the issues raised in the June 8 NPS comment letter, the Commonwealth will prepare a Draft Final FS, followed by NPS review and comment incorporation into a Final FS. NPS acceptance of the Final FS will conclude the Commonwealth's obligations under the existing Agreement.

Contacts: Mike Caldwell, VAFO Superintendent, 610-783-1037